# UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

IN RE: IN PROCEEDINGS UNDER CHAPTER 13

SHANNON MARIE HOKES FKA SHANNON MARIE CASSIDY CASE NO: 10-55309

JUDGE: MARILYN SHEA-STONUM

**Debtor** 

# OBJECTION TO CONFIRMATION OF PLAN (1706 E. Barlow Road, Hudson, Ohio 44236)

PARK VIEW FEDERAL SAVINGS BANK, ("Creditor"), a secured creditor herein, and holder of the first mortgage on the real estate owned by the debtor and located at 1706 E. Barlow Road, Hudson, Ohio 44236, and hereby objects to the confirmation of the Debtor's Plan pursuant to 11 U.S.C., §§1307 (c)(1) and 1324. Said real estate is more fully described in the Mortgage Deed attached hereto and marked as Exhibit "B". This Objection to Confirmation is supported as follows:

The pre-petition arrearage on Creditor's mortgage through November 18,
 2010, is in excess of \$8,266.65 for which a Proof of Claim has been filed
 (Claim #5). The Debtor's Plan lists the pre-petition arrearage due to
 Creditor as being \$2,766.00.

This Objection is a Standing Objection, and shall continue with reference to the currently proposed plan and any subsequently modified plan.

Respectfully Submitted,

/s/ Mark R. Lembright
FELTY & LEMBRIGHT CO., L.P.A.
Mark R. Lembright (0041545)
Attorney for Creditor
1500 West Third Street, Suite 400
Cleveland, OH 44113
(216) 588-1500 ext 128
(216) 771-4334-fax
mlembright@feltyandlembright.com

## **PROOF OF SERVICE**

I certify that on the	24th	day of	November_	, 2010,
copies of the foregoing were served	d by mailing th	e same by o	rdinary U.S.	Mail, postage
prepaid, and/or electronically as pe	ermitted by loca	al rule, to the	e persons list	ed below.

### Served by Regular U.S Mail

Shannon Marie Hokes 1706 Barlow Road Hudson, OH 44236 Debtor

### **Electronic Mail Notice List**

The following is a list of parties who are currently on the list to receive e-mail notice/service for this case:

Keith Rucinski, Trustee efilings@ch13akron.com

Robert M. Whittington, Jr., Esq. Debtor's Attorney elkwhitt@neo.rr.com

Office of the U.S. Trustee Howard M. Metzenbaum U.S. Courthouse 201 Superior Ave. East Ste. 441 Cleveland, OH 44114

Respectfully Submitted,

/s/ Mark R. Lembright
FELTY & LEMBRIGHT CO., L.P.A.
Mark R. Lembright (0041545)
Attorney for Creditor
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Cleveland, OH 44113
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(216) 771-4334-fax
mlembright@feltyandlembright.com

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